

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHNATHAN BUMA,

Defendant.

No. CR 25-58-JVS

PROTECTIVE ORDER FOR DISCOVERY

The Court has read and considered the stipulation filed by the parties on October 1, 2025, requesting entry of a protective order pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, which is incorporated by reference. For good cause shown, IT IS HEREBY ORDERED THAT:

1. The government may provide to defendant's counsel a copy of any Protective Order Material under the following terms and conditions:

a. The government will provide to the Defense Team, as defined below in paragraph 1(f), Protective Order Material(s), redacted if and as appropriate. The government will label the Protective Order Material(s) as being subject to a protective order.

b. The Defense Team is permitted to make copies of the Protective Order Material(s) as necessary for the preparation of the

1 defense and for litigation of matters that arise therefrom. The
2 Defense Team shall return all copies of the Protective Order
3 Material(s) to the government, certify that such materials have been
4 destroyed, or certify that such materials are being kept pursuant to
5 the Business and Professions Code and the Rules of Professional
6 Conduct, at the conclusion of this case and any appeal or post-
7 conviction collateral attack on any conviction or sentence arising
8 therefrom. The Defense Team shall ensure that defendant does not
9 retain any Protective Order Material(s) or copies thereof after the
10 conclusion of this case and any appeal or post-conviction collateral
11 attack on any conviction or sentence arising therefrom.

12 c. The Defense Team shall maintain all Protective Order
13 Material(s), including any copies, in accordance with this Order.

14 d. The Protective Order Material(s) (whether in physical
15 or electronic form) shall be securely stored at all times by the
16 Defense Team, except while being actively utilized as provided for in
17 this Order.

18 e. A copy of this Order shall be kept with the Protective
19 Order Material(s) at all times.

20 f. The Protective Order Material(s) and its contents
21 shall not be disseminated¹ to the media or posted to the Internet,
22 nor shall the information within Protective Order Material(s) be
23 disclosed in any way to any media source or Internet forum, nor shall
24 the Protective Order Material(s) and its contents be disseminated to
25 any persons, organizations, or other entities, other than the
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27 ¹ "Disseminated" means to directly or indirectly provide, show,
28 or describe to another (or others) either a particular piece of
discovery or quotations, excerpts, or summaries derived therefrom.
It includes both physical and virtual sharing of the documents.

1 following who must be assisting in the preparation of the defense in
2 this case in order to gain access to any Protective Order
3 Material(s): (i) defendant (under the conditions set forth below);
4 (ii) defendant's counsel of record and supporting members of the
5 defendant's defense legal team (paralegals, investigators,
6 translators, litigation support personnel, and secretarial staff);
7 and (iii) experts and consultants retained to assist in the
8 preparation of the defense (collectively, the "Defense Team").

9 g. Counsel for defendant shall ensure that any person to
10 whom Protective Order Material(s) have been made available has read
11 the terms of the requested order and agreed to act in accordance with
12 the requested order.

13 h. The Defense Team may show Protective Order Material(s)
14 to third-party witnesses for the sole purpose of preparation of the
15 defense, but may not provide or otherwise disseminate to third-party
16 witnesses copies of Protective Order Material(s).

17 i. Defendant may review Protective Order Material(s) in
18 this case only in the presence of a member of the Defense Team, and
19 defendant's counsel of record shall ensure that defendant is never
20 left alone with any Protective Order Material(s). Defendant may see
21 and review Protective Order Material(s) in the presence of a member
22 of the Defense Team, but defendant may not copy, keep, maintain, or
23 otherwise possess any Protective Order Material(s) in this case at
24 any time. Defendant must return any Protective Order Material(s) to
25 the Defense Team at the conclusion of any meeting at which defendant
26 is permitted to view the Protective Order Material(s). Defendant may
27 not take any Protective Order Material(s) out of the room in which
28 defendant is meeting with the Defense Team. Defendant may not write

1 down or memorialize any Protective Order Material(s). At the
2 conclusion of any meeting with defendant, the member of the Defense
3 Team present shall take with him or her the Protective Order
4 Material(s). At no time, under no circumstance, will any Protective
5 Order Material(s) be left in the possession, custody, or control of
6 the defendant, whether the defendant is incarcerated or not.

7 2. The Protective Order Material(s), including any copies, may
8 not be used, introduced, or otherwise relied upon, in any proceeding
9 by any person, except by the prosecution team at its discretion or by
10 defendant's counsel of record in this case in hearings and
11 proceedings in United States v. Johnathan Buma, CR 25-58-JVS (Central
12 District of California) and any appeal or any post-conviction
13 collateral attack on any conviction or sentence arising therefrom.

14 3. The Defense Team shall return all Protective Order
15 Material(s), including all copies, to the United States Attorney's
16 Office ("USAO") for the Central District of California, certify that
17 such materials have been destroyed, or certify that such materials
18 are being kept pursuant to the Business and Professions Code and the
19 Rules of Professional Conduct, at the conclusion of this case and any
20 appeal or post-conviction collateral attack on any conviction or
21 sentence arising therefrom.

22 4. Should defendant change attorneys at any time before the
23 Protective Order Material(s) and all copies are returned to the USAO,
24 his former counsel will not provide the Protective Order Material(s),
25 including any copies, or disclose the contents of any Protective
26 Order Material(s) to any subsequent counsel unless subsequent counsel
27 for the defendant in this matter has agreed to in writing, or has
28 been ordered by the Court to, be bound by this protective order. If

1 subsequent counsel's consent to this Order cannot be obtained,
2 defendant's former counsel will not provide any Protective Order
3 Material(s) to subsequent counsel.

4 5. Any papers to be filed with the Court on behalf of the
5 defendant that include Protective Order Material(s) or refer to the
6 contents of Protective Order Material(s) shall be filed under seal
7 unless the defendant obtains a) written agreement from the government
8 assenting to public filing, or b) an order of the Court. Any papers
9 to be filed with the Court by the government that include Protective
10 Order Material(s) or refer to the contents of Protective Order
11 Material(s) may be filed under seal in the government's discretion.

12 6. Any papers to be filed with the Court in response to papers
13 filed in conformity with the preceding paragraph shall also be filed
14 under seal absent the written agreement of the opposing party or an
15 order of the Court.

16 7. Nothing in this Order will be construed so as to limit or
17 restrict the government's discovery obligations pursuant to Rule 16
18 of the Federal Rules of Criminal Procedure and Brady v. Maryland, 373
19 U.S. 83 (1963), or any other provision of law.

20 8. Nothing in this order shall be construed: (1) as a waiver
21 by the defendant to seek additional discovery beyond that provided by
22 the government; or (2) as a waiver of the defendant's right to seek
23 an unredacted version of any Protective Order Material(s); or (3) as
24 a waiver of the defendant's right to challenge whether a specific
25 document should be subject to this protective order.


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1 Nothing in this order shall be construed as limiting the government's
2 ability to object to those requests. In addition, the parties
3 reserve the right to seek future modifications of this protective
4 order.

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6 DATED: October 01, 2025

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9 THE HONORABLE JAMES V. SELNA
UNITED STATES DISTRICT JUDGE